

# **Exhibit B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TETHER AND BITFINEX CRYPTO  
ASSET LITIGATION

Case No. 1:19-cv-09236-KPF

**BITTREX, INC.'S OBJECTIONS AND RESPONSES  
TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION (NOS. 1-70)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, through its undersigned counsel, Defendant Bittrex, Inc., hereby objects and responds to Plaintiffs' First Request for Production of Documents to Bittrex as follows:

**GENERAL OBJECTIONS**

The following General Objections apply to each and every request Plaintiff propounded and are incorporated into each of the following responses by reference as if set forth fully therein.

1. Bittrex objects to the definitions of "You," "Your," "Defendants," "Bittrex," "Bitfinex," "Bitfinex Defendants," "Crypto Capital," "DigFinex," "Poloniex," "Tether," and "Tether Defendants" as vague, ambiguous, overly broad, and unduly burdensome insofar as they purports to include "agents," "partners," "predecessors," "subsidiaries" and "affiliates" of those entities and "all other persons . . . presently or formerly acting or purporting to act on behalf of" those entities "or who are subject to the direction or control of" those entities. In responding to the Requests, Bittrex will interpret each term to include the named entity and its employees and directors.

2. Bittrex objects to the definitions of "Counterparty" as vague and ambiguous. Bittrex will use a definition appropriate for the specific request using the term.

3. Bittrex objects to the definition of “Relating to,” “referring to,” “referring or relating to,” and “related to” and all Requests using any of these terms as overly broad and unduly burdensome. In responding to the Requests, Bittrex will consider these terms to mean discussing, reflecting, referring to, describing, and analyzing.

4. Bittrex objects to the Instructions to the extent they attempt to impose obligations beyond those provided under Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Bittrex will not follow such “instructions” from Plaintiffs but will comply with the law.

5. Bittrex objects to Instruction 13 because it seeks documents and information from a time period beginning on July 1, 2014. Unless otherwise indicated, Bittrex will produce documents dated on or after February 17, 2015, since that is the beginning of the class period Plaintiffs have proposed in this action.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Documents sufficient to show the existence and subject matter of any investigation or inquiry of You that any governmental entity has undertaken or made.

#### **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

In addition to its General Objections, Bittrex objects to this request as overly broad and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects to this request to the extent it calls for the production of documents sufficient to show the existence of investigations that Bittrex may not be aware of or otherwise know about.

Without waiving the foregoing General and Specific objections, Bittrex will produce documents sufficient to show any inquiry it has received from a governmental entity about USDT, Tether, or Bitfinex to the extent permissible by law and regulation.

**REQUEST FOR PRODUCTION NO. 2:**

Documents sufficient to show any agreement between You and any Bitfinex Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce documents sufficient to show any agreement it has with Bitfinex.

**REQUEST FOR PRODUCTION NO. 3:**

Documents sufficient to show any agreement between You and any Tether Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce documents sufficient to show any agreement it has with Tether.

**REQUEST FOR PRODUCTION NO. 4:**

Documents sufficient to show any agreement between You and Digfinex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce documents sufficient to show any agreement it has with Digfinex.

**REQUEST FOR PRODUCTION NO. 5:**

Documents sufficient to show any agreement between You and Poloniex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce documents sufficient to show any agreement it has with Poloniex.

**REQUEST FOR PRODUCTION NO. 6:**

Documents sufficient to show all know-your-customer ("KYC") policies or practices that Bittrex has implemented since it was founded and when they were implemented and/or modified.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce its KYC policies in effect during the proposed class period.

**REQUEST FOR PRODUCTION NO. 7:**

Documents sufficient to show all anti-fraud policies or practices that Bittrex has implemented since it was founded and when they were implemented and/or modified.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce its anti-fraud policies in effect during the proposed class period.

**REQUEST FOR PRODUCTION NO. 8:**

All Documents relating to Your understanding, analysis, or assessment of the crypto-exchanges that constitute Bittrex's competitors.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce non-privileged documents discussing, analyzing, or assessing the competition Bittrex faced from other U.S.-based crypto-exchanges during the proposed class period that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 9:**

All Documents relating to Your cooperation, coordination, or communication with any Tether Defendant, Bitfinex Defendant, and/or Individual Defendant relating to the enabling of USDT trading on Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “cooperation,” “coordination,” and “the enabling of USDT trading.”

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged internal Bittrex communications, and any non-privileged communications between Bittrex and any Tether Defendant, any Bitfinex Defendant, or any of the Individual Defendants, about Bittrex permitting USDT to be traded on the Bittrex exchange that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 10:**

All Documents relating to Your understanding, analysis, or assessment of any formal or informal relationship between any Tether Defendant and any Bitfinex Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “formal or informal relationship.” Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing, assessing, or analyzing any ways in which any Tether Defendant is affiliated with any Bitfinex Defendant that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 11:**

All Documents relating to Your decision to advertise to Your customers, beginning on or about August 25, 2017, the ability to purchase USDT from Bittrex through wire transfer processed using \$1 for 1 USDT.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing whether and how Bittrex decided to advertise to Bittrex's customers that in August 2017 customers could purchase USDT through wire transfer processed using \$1 for 1 USDT that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 12:**

All Documents relating to any press releases concerning Bittrex's use and/or integration of Tether.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase "integration of Tether." Bittrex further objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce any press releases about the ability of customers to purchase Tether on Bittrex and any non-privileged drafts of those press releases that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 13:**

All Documents relating to Your understanding, analysis, or assessment of the collateral or backing received for each mint of USDT.



**RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “collateral,” “backing,” and “mint of USDT.” Bittrex further objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing, assessing, or analyzing whether USDT is fully backed by USD that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 14:**

All Documents relating to Your understanding, analysis, or assessment of the transfer of newly issued USDT from any Tether Defendant to any Bitfinex Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing any transfer of newly issued USDT from any Tether Defendant to any Bitfinex Defendant that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 15:**

All Documents You submitted to the New York Department of Financial Services in connection with Your application to engage in Virtual Currency Business Activity in New York.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

In addition to its General Objections, Bittrex objects to this request as overly broad and seeking information that is not relevant to the parties’ claims or defenses.

**REQUEST FOR PRODUCTION NO. 16:**

All Documents relating to Your analysis or assessment of, and/or reaction to, the decision of the New York Department of Financial Services to reject Your application to engage in Virtual Currency Business Activity in New York.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

In addition to its General Objections, Bittrex objects to this request as overly broad and seeking information that is not relevant to the parties' claims or defenses.

**REQUEST FOR PRODUCTION NO. 17:**

All Documents relating to any Bitfinex Defendant's use of Bittrex relating to the issuance or sale of newly issued USDT, including the transfer of such USDT to any Bittrex account or to any address controlled by Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases "use of Bittrex relating to the issuance or sale of newly issued USDT" and "any address controlled by Bittrex."

**REQUEST FOR PRODUCTION NO. 18:**

All Documents relating to any Tether Defendant's use of Bittrex relating to the issuance or sale of newly issued USDT, including the transfer of such USDT to any Bittrex account or to any address controlled by Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases "use of Bittrex relating to the issuance or sale of newly issued USDT" and "any address controlled by Bittrex."

**REQUEST FOR PRODUCTION NO. 19:**

All Documents relating to Your understanding, analysis, or assessment of the reasons or explanation for the timing of any Bitfinex Defendant's use of USDT in any Bittrex account, or in any address controlled by Bittrex, to purchase cryptocommodities.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase "any address controlled by Bittrex." Bittrex further objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance report for, and any non-privileged documents discussing USDT transactions in, any Bittrex account owned by Bitfinex that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 20:**

All Documents relating to Your understanding, analysis, or assessment of the reasons or explanation for the timing of any Tether Defendant's use of USDT in any Bittrex account, or to any address controlled by Bittrex, to purchase cryptocommodities.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase "any address controlled by Bittrex." Bittrex further objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance report for, and any non-privileged documents discussing USDT transactions in, any Bittrex account owned by Tether that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 21:**

All Documents relating to Your understanding, analysis, or assessment of the reasons or explanation for the extent of any Bitfinex Defendant's use of USDT to purchase or sell cryptocommodities on Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase "for the extent of." Bittrex further objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance report for, and any non-privileged documents discussing, any Bittrex account owned by Bitfinex and any non-privileged documents discussing trading in USDT in an account owned by Bitfinex that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 22:**

All Documents relating to Your understanding, analysis, or assessment of the reasons or explanation for the extent of any Tether Defendant's use of USDT to purchase or sell cryptocommodities on Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance report for, and any non-privileged documents discussing, any Bittrex account owned by Tether and any non-privileged documents discussing trading in USDT in an account owned by Tether that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 23:**

All Documents relating to Your understanding, analysis, or assessment of whether and the extent to which accounts on or addresses controlled by Bittrex could be used and/or have been used to affect or manipulate the price of any crypto-asset or cryptocommodity.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “accounts on or addresses controlled by Bittrex.” Bittrex further objects to this request as overly broad and unduly burdensome, given that it would capture all accounts or addresses controlled by Bittrex, with no limitation to the cryptocurrency accounts or addresses that might be relevant to this case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing the use of USDT for market manipulation or the potential for market manipulation, or efforts to combat the use of USDT for market manipulation, on the Bittrex exchange that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 24:**

All Documents relating to Your understanding, analysis, or assessment of any connection or relationship between (i) any change in cryptocommodity prices or trading volumes; and (ii) any transactions on Bittrex relating to or involving transactions associated with any of the following addresses used for both Bitcoin and USDT transactions:

- 1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW

- 1MZAayfFJ9Kki2csoYjFVRKHFFSskdoMLtX
- 1Po1oWkD2LmodfkBYiAktwh76vkF93LKnH
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing, assessing, or analyzing any connection or relationship between (i) the below accounts or trading in the below accounts and (ii) changes in the pricing or volume of cryptocurrencies that Bittrex locates after a reasonable search:

- 1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1Po1oWkD2LmodfkBYiAktwh76vkF93LKnH
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 25:**

All Documents relating to Your understanding, analysis, or assessment of any connection or relationship between (i) any change in cryptocommodity prices or trading volumes; and (ii) any transactions on Bittrex relating to or involving transactions associated with any of the following Bitcoin addresses:

- 1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb
- 1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g

- 3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r
- 17A16QmavnUfCW11DAApiJxp7ARnxN5pGX
- 12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P
- 13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv
- 1N52wHoVR79PMDishab2XmRHsbekCdGquK
- 1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA
- 1DEcTtkrbdXxS1wbrMvzub5X4VpByYmAwo

**RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

In addition to its General Objections, Bittrex objects to this request as unduly burdensome and seeking information that is not relevant to the parties' claims or defenses.

**REQUEST FOR PRODUCTION NO. 26:**

All Documents relating to Your analysis or assessment of whether to report any cryptocurrency transactions relating to or associated with any of the following addresses as suspicious to any investigatory, regulatory, or any other government entity, for both Bitcoin and USDT transactions:

- 1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX
- 1Po1oWkD2LmodfkBYiAktwh76vkF93LKnh
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome. Bittrex further objects to this request as seeking documents that may be protected by the Bank Secrecy Act, attorney-client privilege, work product protections, or other privileges. By law, Bittrex cannot produce any Suspicious Activity Reports or documents that reflect or discuss such reports.

Without waiving the foregoing General and Specific objections, Bittrex will produce to the extent permissible by law and regulation any non-privileged documents discussing the below accounts or trading in the below accounts that Bittrex locates after a reasonable search:

- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1Po1oWkD2LmodfkBYiAktwh76vkF93LKnh
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 27:**

All Documents relating to Michael Novogratz, Galaxy Digital Trading Cayman LLC, Galaxy Digital LP, and/or Galaxy Benchmark Crypto Index Master Fund LP.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses.



**REQUEST FOR PRODUCTION NO. 28:**

All Documents relating to “The Tether Report,” or “Quantifying the Effect of Tether,” published in January 2018, including Your analysis or assessment thereof and/or response thereto.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing “The Tether Report” that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 29:**

All Documents relating to the article “Is Bitcoin Really Un-Tethered?” by John Griffin, and/or any supplements to that article, including Your analysis or assessment thereof and/or response thereto.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing “Is Bitcoin Really Un-Tethered?” that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 30:**

All Documents relating to the article in Medium published by Dr. Gerald Martinez on July 12, 2018, including Your analysis or assessment thereof and/or response thereto.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

In addition to its General Objections, Bittrex objects to this request as overly broad and unduly burdensome.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing the article that Gerard Martinez published on Medium on July 12, 2018 that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 31:**

All Documents relating to any analyses or assessments of any actual, prospective, assumed, and/or suspected market for crypto-assets, including stablecoins and/or cryptocommodities.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “actual, prospective, assumed, and/or suspected market.” Bittrex further objects to this request as overly broad and unduly burdensome and not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 32:**

All Documents relating to any analyses or assessments of any actual, prospective, assumed, and/or suspected market for crypto-asset futures contracts, including futures contracts based on stablecoins and/or cryptocommodities.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “actual, prospective, assumed, and/or suspected

market.” Bittrex further objects to this request as overly broad and unduly burdensome and not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 33:**

All Documents relating to any analyses or assessments of any actual, prospective, assumed and/or suspected price manipulation in any market for crypto-assets, including stablecoins and/or cryptocommodities.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “actual, prospective, assumed and/or suspected price manipulation.” Bittrex further objects to this request as overly broad and unduly burdensome and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing the use of USDT for price manipulation in a cryptocurrency market that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 34:**

All Documents discussing any actual or potential impact of USDT issuances on the prices of crypto-commodities.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing how USDT issuances impact or could potentially impact the price of crypto-commodities that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 35:**

All Documents relating to any practice, convention, or policy at Bittrex on the use of new deposit addresses for the transfer of USDT to a Bittrex account or an address controlled, directly or indirectly, by Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “practice, convention, or policy at Bittrex on the use of new deposit addresses for the transfer of USDT to a Bittrex account or an address controlled, directly, or indirectly, by Bittrex.”

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged document that instructs customers on how to generate or request new deposit addresses for the transfer of USDT to Bittrex accounts that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 36:**

All Documents relating to any practice, convention, or policy at Bittrex on the repeated use of deposit addresses for the transfer of USDT to a Bittrex account or an address controlled, directly or indirectly, by Bittrex.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “practice, convention, or policy at Bittrex on the

use of new deposit addresses for the transfer of USDT to a Bittrex account or an address controlled, directly, or indirectly, by Bittrex.”

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged document that instructs customers on how to repeatedly use a deposit address for the transfer of USDT to Bittrex accounts that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 37:**

All Documents relating to any of the following addresses used for both Bitcoin and USDT transactions, including Your application of federal know-your-customer (“KYC”) requirements to determine the identity or identities of the users of these addresses:

- 1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX
- 1Po1oWkD2LmodfkBYiAktwh76vkF93LKnH
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “application of federal know-your-customer (‘KYC’) requirements” and “users of these addresses.” Bittrex further objects to this request as overly broad and unduly burdensome. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance reports for the below accounts that Bittrex locates after a reasonable search:

- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 38:**

Documents sufficient to show the cryptocommodity addresses that You own or control, including for Bitcoin, Bitcoin Cash (including as a fork from Bitcoin), Ethereum, and any other cryptocommodities that You purchased or sold through any such address.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “own or control” and “as a fork from Bitcoin.” Bittrex further objects to this request as seeking information that is not relevant to the parties’ claims or defenses.

**REQUEST FOR PRODUCTION NO. 39:**

Documents sufficient to show the identities of each of the Owners of the Specified Blockchain Addresses.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

In addition to its General Objections, Bittrex objects to this request as seeking information that is not relevant to the parties’ claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance reports for the below accounts that Bittrex locates after a reasonable search:

- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw

- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 40:**

All Documents related to the Owners of the Specified Blockchain Addresses.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case. Bittrex further objects to this request as seeking information that is not relevant to the parties' claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance reports for the below accounts:

- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 41:**

Documents sufficient to show any other blockchain addresses owned or controlled by the owners of the Specified Blockchain Addresses.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

In addition to its General Objections, Bittrex objects to this request as seeking information that is not relevant to the parties' claims or defenses.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents identifying blockchain addresses that Bittrex knows to be associated with an owner of the below accounts that Bittrex locates after a reasonable search:

- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw

- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 42:**

All Documents relating to any activity—including deposits, withdrawals, transfers, or trading activity (whether on-chain or off-chain transactions or transfers, and whether conducted on Bitfinex or through OTC or private arrangements)—relating to any of the Owners’ accounts on Bittrex, including (i) activity related to the Specified Blockchain Addresses and any other blockchain addresses that the Owners own or control and (ii) fiat currency transactions. For each such transaction, include Documents sufficient to show the following:

- The identity of buyer and seller
- The assets transacted or exchanged
- The date and time of the transaction
- The price (exchange rate) of the transaction
- The volume of the transaction
- In the case of any derivative transaction, the details of the contract

**RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “on-chain or off-chain transactions or transfers,” “whether conducted on Bitfinex or through OTC or private arrangements,” “Owners’ accounts on Bittrex,” “price (exchange rate) of the transaction,” “volume of the transaction,” and “derivative transaction.” Bittrex further objects to this request as overly broad and unduly burdensome. Bittrex further objects that this request is not proportional to the needs of the case.



Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance reports for the below accounts that Bittrex locates after a reasonable search. Bittrex will also produce any communications with the owners of the below accounts about their accounts that Bittrex locates after a reasonable search:

- 1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**REQUEST FOR PRODUCTION NO. 43:**

Documents sufficient to show the identity of the Counterparties with whom the Owners of the Specified Blockchain Addresses transacted.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “identity of the Counterparties.” Bittrex further objects to this request as overly broad and unduly burdensome. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 44:**

Documents sufficient to show any other blockchain addresses that the Counterparties owned or controlled.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “any other blockchain addresses” and “owned or controlled.” Bittrex further objects to this request as overly broad, unduly burdensome, and

seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 45:**

All Documents relating to any activity—including deposits, withdrawals, transfers, or trading activity (whether on-chain or off-chain transactions or transfers, and whether conducted on Bitfinex or through OTC or private arrangements)—relating to any of the Counterparties' accounts on Bittrex, including (i) activity related to the Specified Blockchain Addresses and any other blockchain addresses that the Counterparties own or control and (ii) fiat currency transactions. For each such transaction, include Documents sufficient to show the following:

- The identity of buyer and seller
- The assets transacted or exchanged
- The date and time of the transaction
- The price (exchange rate) of the transaction
- The volume of the transaction
- In the case of any derivative transaction, the details of the contract

**RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “any other blockchain addresses” and “own or control.” Bittrex further objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 46:**

All Documents related to all wallets or deposit accounts owned or controlled by any Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrases “wallets” and “deposit accounts.” Bittrex further objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce the compliance reports for wallets or deposit accounts, and any non-privileged documents discussing wallets or deposit accounts, where customer records reflect that those wallets or deposit accounts are owned by any of the defendants that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 47:**

All Documents relating to Crypto Capital, Crypto SP. Z.O.O., Global Trading Solutions, AG, and/or Global Trading Solutions LLC.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing Crypto Capital, Crypto SP. Z.O.O., or Global Trading Solutions LLC that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 48:**

All Documents relating to DigFinex's ownership of and/or control over any Bitfinex Defendant and/or any Tether Defendant.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

Without waiving the foregoing General objections, Bittrex will produce any non-privileged documents discussing whether DigFinex owns or controls any of the Bitfinex Defendants or any of the Tether Defendants that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 49:**

Documents sufficient to show the total daily trading volume of each exchange pair on Bittrex for each day since Bittrex was founded.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase "each exchange pair." Bittrex further objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 50:**

Documents sufficient to show Your yearly revenues and profits, and the sources thereof, for each year since Bittrex was founded.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

In addition to its General Objections, Bittrex objects to this request as seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 51:**

Documents sufficient to show Your fees collected on the trading and/or withdrawals involving any of the following addresses used for both Bitcoin and USDT transactions:

- 1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw
- 1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh
- 1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
- 1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
- 1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX
- 1Po1oWkD2LmodfkBYiAktwh76vkF93LKnH
- 1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru

**RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “involving . . . [an] address.” Bittrex further objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties’ claims or defenses.

**REQUEST FOR PRODUCTION NO. 52:**

Documents sufficient to show Your fees collected on the trading and/or or withdrawals involving any of the following Bitcoin addresses:

- 1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb
- 1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g
- 3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r
- 17A16QmavnUfCW11DAApiJxp7ARnxN5pGX
- 12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P

- 13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv
- 1N52wHoVR79PMDishab2XmRHsbekCdGquK
- 1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA
- 1DEcTtkrbdXxS1wbrMvzub5X4VpByYmAwo

**RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “involving.” Bittrex further objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 53:**

All Documents relating to Heisenberg Capital.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 54:**

All Documents relating to Ivan Manuel Molina Lee, Ana Andrea Urriola Pan, and/or Bolivar Jose Gonzalez.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 55:**

All Documents relating to Noble Markets LLC.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 56:**

All Documents relating to Paycase Financial.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 57:**

All Documents relating to Prosperity Revenue Merchandising Limited.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing Prosperity Revenue Merchandising Limited that Bittrex locates after a reasonable search. Bittrex will also produce any communications with Prosperity Revenue Merchandising Limited that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 58:**

All Documents relating to Shyft Network.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 59:**

All Documents relating to Daniel Barrs and/or Global Transaction Services.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing Daniel Barrs or Global Transaction Services that Bittrex locates after a reasonable search. Bittrex will also produce any communications with Daniel Barrs or Global Transaction Services that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 60:**

All Documents relating to Oz Yosef.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing Oz Yosef that Bittrex locates after a reasonable search. Bittrex will also produce any communications with Oz Yosef that Bittrex locates after a reasonable search.



**REQUEST FOR PRODUCTION NO. 61:**

All Documents relating to Smart Property Solutions, AG, Data Nest SA, Hamid Reza Khoyi, Aron Camponovo, and/or Oliver Camponovo.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 62:**

All Documents relating to Potter Ventures LLC, Fangorn LLC, and/or Bitcoin Management Solutions LLC.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 63:**

All Documents relating to Friedman LLP and/or the Memorandum Regarding Consulting Services Performed, dated September 28, 2017.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 64:**

All Documents relating to Chris Ellis.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 65:**

All Documents relating to Brock Pierce.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any non-privileged documents discussing Brock Pierce that Bittrex locates after a reasonable search. Bittrex will also produce any communications with Brock Pierce that Bittrex locates after a reasonable search.

**REQUEST FOR PRODUCTION NO. 66:**

All Documents relating to Jump Trading LLC.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 66:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 67:**

Documents sufficient to show the identity of all wallets or other identifiers sufficient to show Your purchases of crypto assets for Your own account, including all accounts owned or controlled by Your employees or agents.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 67:**

In addition to its General Objections, Bittrex objects to this request as vague and ambiguous, including in its use of the phrase “other identifiers.” Bittrex further objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties’ claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

**REQUEST FOR PRODUCTION NO. 68:**

Documents sufficient to identify witnesses with knowledge of information relevant to the subject matter of the action.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 68:**

In addition to its General Objections, Bittrex objects to this request as not compliant with Rule 34(b)(1)(A), which requires a request to “describe with reasonable particularity” the documents sought. Bittrex further objects to this request as overbroad and unduly burdensome.

**REQUEST FOR PRODUCTION NO. 69:**

Documents sufficient to show the existence, custodian, location and general description of relevant documents.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

In addition to its General Objections, Bittrex objects to this request as not compliant with Rule 34(b)(1)(A), which requires a request to “describe with reasonable particularity” the documents sought.

**REQUEST FOR PRODUCTION NO. 70:**

All documents relating to Your policies and practices for retaining documents.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

In addition to its General Objections, Bittrex objects to this request as overly broad, unduly burdensome, and seeking information that is not relevant to the parties' claims or defenses. Bittrex further objects that this request is not proportional to the needs of the case.

Without waiving the foregoing General and Specific objections, Bittrex will produce any written document-retention policy in effect during the proposed class period.

DATED: January 28, 2022

Respectfully submitted,

/s/ Abby F. Rudzin

**O'MELVENY & MYERS LLP**

Abby F. Rudzin  
Seven Times Square  
New York, NY 10026  
Telephone: (212) 326-2000  
arudzin@omm.com

William K. Pao  
(*admitted pro hac vice*)  
400 South Hope Street  
Los Angeles, California 90071  
Telephone: (213) 430-6000  
wpao@omm.com

**MCNAUL EBEL NAWROT &  
HELGREN PLLC**

Greg J. Hollon  
(*admitted pro hac vice*)  
Timothy B. Fitzgerald  
600 University Street, Suite 2700  
Seattle, WA 98101  
Telephone: (206) 467-1816  
ghollon@mcnaul.com  
tfitzgerald@mcnaul.com

*Attorneys for Bittrex, Inc.*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document was served on counsel for the parties via electronic mail on January 28, 2022.

A hard copy was served on Reginald Fowler by United States Mail, First Class, at the below address, postmarked January 28, 2022.

Reginald Fowler  
7100 W. Erie Street  
Chandler, AZ 85226

/s/ Eamonn W. Campbell

Eamonn W. Campbell